

<p>Attorney or Party Name, Address, Telephone &amp; FAX Nos., State Bar No. &amp; Email Address</p> <p>J. Bennett Friedman, Esq. (SBN 147056) Michael Sobkowiak, Esq. (SBN 242718) Friedman Law Group, P.C. 1900 Avenue of the Stars, 11th Fl., Los Angeles, CA 90067 T: (310) 552-8210; F: (310) 733-5442 E: <a href="mailto:jfriedman@flg-law.com">jfriedman@flg-law.com</a>; <a href="mailto:msobkowiak@flg-law.com">msobkowiak@flg-law.com</a></p> <p><input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: CKR Global Advisors, Inc.</p>	<p>FOR COURT USE ONLY</p>
<p>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</p>	
<p>In re:  Mark Elias Crone,  Debtor(s).</p>	<p>CASE NO.: 2:17-bk-12392-BR  ADVERSARY NO.: 2:17-ap-01309-BR  CHAPTER: 7</p>
<p>CKR Global Advisors, Inc.,  vs.  Mark Elias Crone,  Defendant(s).</p>	<p><b>JOINT STATUS REPORT</b> [LBR 7016-1(a)(2)]</p> <p>Plaintiff(s).  DATE: 12/11/2018 TIME: 2:00 p.m. COURTROOM: 1668 ADDRESS: 255 E. Temple St. Los Angeles, CA 90012</p>

The parties submit the following JOINT STATUS REPORT in accordance with LBR 7016-1(a)(2):

**A. PLEADINGS/SERVICE:**

1. Have all parties been served with the complaint/counterclaim/cross-claim, etc. (Claims Documents)?  Yes  No
2. Have all parties filed and served answers to the Claims Documents?  Yes  No
3. Have all motions addressed to the Claims Documents been resolved?  Yes  No
4. Have counsel met and conferred in compliance with LBR 7026-1?  Yes  No

5. If your answer to any of the four preceding questions is anything other than an unqualified "YES," please explain below (or on attached page):  
Defendant's Motion for Summary Judgment is pending.

**B. READINESS FOR TRIAL:**

1. When will you be ready for trial in this case?

<u>Plaintiff</u>	<u>Defendant</u>
February 2019	February 2019

2. If your answer to the above is more than 4 months after the summons issued in this case, give reasons for further delay.

<u>Plaintiff</u>	<u>Defendant</u>
	Plaintiff continues to refuse to respond to outstanding discovery. A Motion to Compel is likely forthcoming unless summary judgment is granted.

3. When do you expect to complete your discovery efforts?

<u>Plaintiff</u>	<u>Defendant</u>
Discovery completion date is December 21, 2018. The parties are meeting and confereing per LBRs regarding sufficiency of responses to written discovery	Discovery completion date is December 21, 2018. The parties are meeting and confereing per LBRs regarding sufficiency of responses to written discovery.

4. What additional discovery do you require to prepare for trial?

<u>Plaintiff</u>	<u>Defendant</u>
Deposition of Mark Crone is set for December 13, 2018. The parties are meeting and confereing per LBRs regarding sufficiency of responses to written discovery.	Deposition of Plaintiff is set for December 7, 2018. The parties are meeting and confereing per LBRs regarding sufficiency of responses to written discovery.

**C. TRIAL TIME:**

1. What is your estimate of the time required to present your side of the case at trial (*including rebuttal stage if applicable*)?

<u>Plaintiff</u>	<u>Defendant</u>
3 days	3 days

2. How many witnesses do you intend to call at trial (*including opposing parties*)?

<u>Plaintiff</u>	<u>Defendant</u>
4 to 6 witnesses.	4 to 6 witnesses.

3. How many exhibits do you anticipate using at trial?

Plaintiff  
Approximately 20 to 30 exhibits.

Defendant  
Approximately 20 to 30 exhibits.

**D. PRETRIAL CONFERENCE:**

A pretrial conference is usually conducted between a week to a month before trial, at which time a pretrial order will be signed by the court. [See LBR 7016-1.] If you believe that a pre-trial conference is not necessary or appropriate in this case, please so note below, stating your reasons:

Plaintiff  
Pretrial conference  is  is not requested  
Reasons:  
Narrow issues for trial

Defendant  
Pretrial conference  is  is not requested  
Reasons:  
Narrow issues for trial

Plaintiff  
Pretrial conference should be set after:  
(date) 02/28/2019

Defendant  
Pretrial conference should be set after:  
(date) 02/28/2019

**E. SETTLEMENT:**

1. What is the status of settlement efforts?

The parties attended mediation before Judge Neil Bason on January 19, 2018. The case did not settle. In October 2018 the parties resumed settlement communications and have exchanged settlement proposals.  
Defendant: No settlement efforts are currently pending between Plaintiff and Defendant.

2. Has this dispute been formally mediated?  Yes  No  
If so, when?  
January 19, 2018

3. Do you want this matter sent to mediation at this time?

Plaintiff  
 Yes  No

Defendant  
 Yes  No

**F. FINAL JUDGMENT/ORDER:**

Any party who contests the bankruptcy court's authority to enter a final judgment and/or order in this adversary proceeding must raise its objection below. Failure to select either box below may be deemed consent.

Plaintiff

I do consent  
 I do not consent  
to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

Defendant

I do consent  
 I do not consent  
to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

**G. ADDITIONAL COMMENTS/RECOMMENDATIONS RE TRIAL: (Use additional page if necessary)**

Plaintiff:

- Settlement Efforts: There are five adversary proceedings pending in the bankruptcy case of debtor Mark Crone ("Debtor"). The respective parties are Debtor, Susan Crone (Debtor's ex-spouse), CKR Law, Global Advisors, Jeffrey Rinde and the Chapter 7 Trustee. The question of ownership of 100,000 shares of common stock of Akoustsis Technologies is central to each of the adversary proceedings. The adversaries initiated by CKR Law and Jeffrey Rinde also concern certain loans made to Debtor. Resolution of the litigation in Debtor's bankruptcy case will require a global settlement. While agreements in principle have been reached between certain of the parties, settlement discussions continue to only inch forward.

Because of the slow pace of settlement discussions, plaintiff CKR Law submits that the parties could benefit by participating in a second mediation, or an informal settlement meeting, involving all parties to the pending litigation.

- Discovery: Discovery has been an issue throughout this adversary proceeding. There is an ongoing dispute concerning the relevance of discovery sought by Debtor, in addition to matters relating to the sufficiency of responses to written discovery. The parties are presently meeting and conferring as required by LBR 7026-1(c).

Defendant: Defendant's Motion to Compel is pending. Defendant anticipates filing a Motion for Summary Judgment.

Respectfully submitted,

Date: 11/26/2018

Friedman Law Group, P.C.

Printed name of law firm

Signature

Michael Sobkowiak, Esq.

Printed name

Attorney for: CKR Law, LLP

Date: 11/28/2018

Leslie Cohen Law

Printed name of law firm

Signature

Leslie Cohen, Esq.

Printed name

Attorney for: Mark Elias Crone

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

1900 Avenue of the Stars, 11<sup>th</sup> Floor, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled **JOINT STATUS REPORT** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 11/28/2018, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Stephen F Biegenzahn** efile@sfblaw.com
- **Leslie A Cohen** leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com;allie@lesliecohenlaw.com
- **Howard M Ehrenberg (TR)** ehrenbergtrustee@sulmeyerlaw.com, ca25@ecfcbis.com;C123@ecfcbis.com;hehrenberg@ecf.inforuptcy.com
- **J. Bennett Friedman** jfriedman@flg-law.com, msobkowiak@flg-law.com;jmartinez@flg-law.com
- **Michael D Sobkowiak** msobkowiak@flg-law.com, jmartinez@flg-law.com;jfriedman@flg-law.com
- **United States Trustee (LA)** ustpregion16.la.ecf@usdoj.gov

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (date) 11/28/2018, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

The Hon. Barry Russell  
United States Bankruptcy Court  
255 E. Temple Street, Suite 1660  
Los Angeles, CA 90012

David M. Goodrich, Esq.  
Steven F. Werth, Esq.  
Sulmeyer Kupetz  
333 South Hope Street, 35th Floor  
Los Angeles, CA 90071

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

11/28/2018	Jackeline Martinez	/s/Jackeline Martinez
Date	Printed Name	Signature